

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

CIVIL ACTION NO:04:06-1042

CANDICE MICHELLE HARDWICK, by and
through her Parents and Guardians DARYL LEWIS
HARDWICK and PRISCILLA LEA HARDWICK,

Plaintiffs,

VS.

MARTHA HEYWARD in her individual capacity
and in her official capacity as Principal of Latta
Middle School; GEORGE H. LIEBENROOD, JR.,
In his individual capacity and in his official capacity
as Principal of Latta High School, and the Board of
Trustees of Latta School District (Dillon County
No.3),

Defendants.

**PLAINTIFF'S APPLICATION (MOTION) FOR PRELIMINARY
INJUNCTION & HEARING**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes the Plaintiffs, by and through their counsel of record, with this their Application
(Motion) for Preliminary Injunction and would submit unto this honorable court the following:

1. Plaintiffs filed their Original Complaint containing an application for a Preliminary Injunction on March 31, 2006, accompanied by a Memorandum of Law on the appropriateness of a Preliminary Injunction.
2. Plaintiffs amended their Complaint and Memorandum of Law in July 2006 which was answered by Defendants.
3. Plaintiffs wish to move forward with their application for Preliminary Relief, due to the ongoing violation of Plaintiff's Rights, to include, if the court permits, a hearing on all relevant

issues and after Defendants have responded; pursuant to the custom in this District that such motion be filed separately from the Complaint.

4. That Plaintiffs designate the Amended Memorandum of Law previously filed in this cause to serve as the Memorandum of Law in support of this motion.

That counsel for Plaintiffs has conferred with counsel for Defendants, who state that they are not opposed to this motion.

September 15, 2006

Respectfully submitted,

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